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June 6, 2025

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/9/2025****BY CM/ECF**Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007**Re: United States v. Joel Vasquez
25 Cr. 89 (VEC)**

Dear Judge Caproni:

I write to respectfully request that the Court extend the defendant's deadline to file Rule 12 motions and provide any applicable Rule 12 notices by 10 days from June 20, 2025, to June 30, 2025. The requested extension also applies to the Government's deadline to make expert disclosures under Fed. R. Crim. P. 16 and to respond to the defendant's motions, along with the defendant's deadline to reply. The Government does not object to this application.

An extension of the schedule to file Rule 12 motions and notices is justified by two principal reasons. First, the defense served the Government with a supplemental discovery demand on May 28, 2025, and we are awaiting a response. Second, unfortunately, I suffered an avulsion fracture to my left pinky finger on Saturday, May 31, 2025, while coach pitching a game for my son's baseball league. The avulsion fracture requires immobilization of my pinky by a splint, which is interfering with my ability to type efficiently and effectively.

I thank the Court for its consideration of this unopposed application.

Respectfully submitted,

Andrew John Dalack
Assistant Federal Defender
(212) 417-8768

Cc: AUSA Jerry Fang

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

6/9/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE